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Attorneys for Defendants
Stryker Corporation and Stryker Sales Corporation

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RYAN Q. CLARIDGE,

Plaintiff,

vs.

I-FLOW CORPORATION, a Delaware corporation; I-FLOW, LLC, a Delaware limited liability company; DJO LLC (f.k.a. DJ ORTHOPEDICS, LLC), a Delaware limited liability company; DJO, INCORPORATED, aka DJO, INC., a Delaware corporation; STRYKER CORPORATION, a Michigan corporation; and STRYKER SALES CORPORATION, a Michigan corporation,

Defendants.

CASE NO.: 2:18-cv-01654-GMN-BNW

**STIPULATED JOINT MOTION TO
EXTEND THE AUGUST 31, 2020
DISCOVERY DEADLINE TO
OCTOBER 2, 2020 AND
CORRESPONDING EXTENSION OF
PRE-TRIAL DEADLINES**

Pursuant to the agreement of the Parties and following the August 17, 2020 status conference, the Parties file this stipulated motion for an Order extending the discovery closure deadline to October 2, 2020, along with an extension of all corresponding pre-trial deadlines, pursuant to Fed. R. Civ. P. 16(b)(4) and Local Rules 26-3 and IA 6-1.

After conferring, the parties have agreed that a discovery extension past the current August 31, 2020 deadline is appropriate to enable the parties to complete the remaining discovery, including but not limited to fact and expert depositions, review of Plaintiff's supplemental

1 document productions, the issuance of subpoenas to additional third parties, obtaining and
2 reviewing documents from those third parties, and potential further investigation and discovery
3 stemming from those productions.

4 The Parties still also await the Judge Navarro's decision on Plaintiff's objection to the
5 Court's Order compelling Plaintiff to present for neurological and psychological Rule 35
6 examinations by separate physicians, a prerequisite to scheduling the examinations, obtaining their
7 reports, and possible proceeding with their depositions.

8 **IT IS HEREBY STIPULATED AND AGREED THAT:**

9 With the Court's consent, the discovery closure deadline in this action shall be extended to
10 October 2, 2020. Dispositive motions shall be filed by December 11, 2020, and the Final Pretrial
11 Order shall be submitted by January 11, 2021.

12 **IT IS SO STIPULATED AND AGREED.**

13
14 ER INJURY ATTORNEYS

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19 **IT IS SO ORDERED.**

20 Dated: 8/21/2020

21
22 
23 UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on August 20, 2020, I electronically transmitted the foregoing document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to all counsel in this matter; all counsel being registered to receive Electronic Filing.

/s/ Diane Hashimoto

An employee of Mintz Levin Cohn Ferris Glovsky
and Popeo, P.C.